

## PARTICIPANT PRIVACY NOTICE

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### 1. What is the purpose of this document?

EFL Trust collect some information about you when you take part in our projects. We are committed to keeping your information safe. This privacy notice describes what EFL Trust will do with the information we collect about you, and what your rights are.

This notice applies to participants on our [Talent ID Pathway](#).

### 2. Why do we want information about you?

Sometimes you will take part in a programme that is delivered by coaches from your local Football Club's Community Organisation (we call these clubs a 'CCO'). EFL Trust support CCOs to help them deliver projects, like the one you participate in. Coaches from your CCO tell us when they think you are a talented footballer, and every so often, we let the Football Association ("the FA") know about this too.

Please be aware that there are lots of young people, just like you, who are talented players, so even if we share your details with the FA, please don't be discouraged if the FA does not take the referral any further. The CCO will let you know if this is the case. Sometimes the FA will use the information we have provided to them to monitor you as a football player for a period of time (up to a maximum of 6 years) and your CCO coach will let you and your parents/carers know if this is the case. In some rare cases players may be invited to play at an FA football session.

### 3. Where do we receive your information from?

The information we receive will usually be from the CCO that you participate with. Sometimes we will ask you and your parents/carers for further information, and we will also obtain some information from the FA.

### 4. What kind of information do we have about you, and why?

We collect the following information about you:

Initial information that allows us to send your details to the FA and discuss the referral with you and your parents/carers further:

- Identifying information (such as name and age)
- Contact details – name, telephone numbers and email addresses for you and your parents/carers
- Information about your football ability

Further information about you that is more sensitive and collected directly from you, but not at the initial referral stage. This information allows us to:

- Monitor whether CCOs are making referrals to the FA from a diverse group of players, and to monitor any improvements made by CCOs in reaching a more diverse range of players;
- Encourage players from groups that are currently underrepresented in Girls & Women's football, particularly minority groups, to play football;
- We will also use this information to ensure that, if a referral is passed on to The FA, you can participate in the most suitable pathway for you.

- Ethnicity
- Disability

Information that allows us to know whether the FA do anything further with this referral:

- Whether you work with the FA after we have sent your details to them.

#### 5. What does the law say about us being allowed to use this information?

We will only collect and use your information when the law allows us to. We are allowed to do this where we meet the following conditions:

- Where there is a genuinely positive reason for us using your information, and we don't think this will have a significant negative impact on your rights.

We think it is in your interests, as well as our interests and those of the FA, for us to know that your coaches think you are talented at football. This is because it allows us to offer a limited amount of young people a place on FA coaching sessions. It also allows us to understand whether referrals are accepted and to make changes to our processes if we don't think this process is working very well. We have also let your parents/carers know about the way we are using this information. If you do not want this use of your information, just let us know by emailing us at [DPO@efltrust.com](mailto:DPO@efltrust.com).

- Where you or your parents have given us consent

Consent can be withdrawn at any time by e-mailing [DPO@efltrust.com](mailto:DPO@efltrust.com)

#### 6. Is my personal information shared with other organisations?

We may decide that we need to share your information with the FA so that they know we think you are talented and we may discuss your referral with your coaches at your CCO too. There are lots of young people, just like you, who are talented players, so even if we share your details with the FA please don't be discouraged if they choose not to take the referral any further. They will let you know either way. **You can view the FA privacy notice [here](#).**

There are some organisations that we pay to carry out IT services for us (you can see the list below). We might share your information with those organisations, but only where they are following our direct instructions in what they do with the information. We have contracts in place with those organisations so that we are clear about what they can and can't do with the information. That way we can ensure that your personal information is kept safe.

Those organisations that we enter into contracts with are:

- Substance Views (a database system)
- Organisations that run our IT systems (EFL, Premier League and Elite IT)
- Secure E-mail systems (such as Egress)

In exceptional situations, we might have to share information with an organisation to comply with the law (for example, a court).

#### 7. Is my personal information kept safe?

We have put in place methods to protect your information and will review this regularly. We have security measures that help us to stop your information from being accidentally lost and to stop people seeing your information unless they have a need to do so.

Other organisations will only be given access to your information where they have agreed to treat the information confidentially and to keep it safe.

If we think your information has been lost or stolen, we have a process to deal with this, as the law requires us to.

#### 8. How long will you keep my information for?

We will only keep your information for as long as we need to.

We will keep your information in a way that we can tell who you are until the FA decide whether or not to accept a referral. If they do not proceed with your referral, we will not keep that information in a way we can tell it's you any longer. If the FA do proceed with your referral, or they choose to monitor your progress, then we will keep your information for as long as you are involved with the FA, up to a maximum of six years. After this time has passed, we will make sure that the information is anonymised (nobody can tell who it belongs to) or deleted completely.

EFL Trust will keep your more sensitive information (relating to ethnicity and or disability) for a maximum of 6 months.

#### 9. What are my rights in connection with my information?

You have the following rights:

- To be informed: We have to tell you what we are going to do with your information. This document is designed to ensure you know what we are going to do with your information.
- Access: You can ask for a copy of the information we hold about you.
- Correction: This enables you to tell us if information we have about you is wrong and to ask us to correct it.
- Right to be forgotten: This enables you to ask us to delete or remove personal information where there is no good reason for us to hold it.
- Object: this applies when you want to object to us processing your information.
- Restriction: You can ask us to suspend using your information for a short period, for example if you want us to establish that information about you is correct.
- Request the data is transferred electronically (also known as the right to data portability): You can ask us to transfer your information to yourself or another organisation.
- Right to withdraw consent: Where we have asked for your consent, you can choose to withdraw that consent for us to use your information at any time.

Please note, some of the above rights apply only in certain situations. For further information or to exercise any of these rights, please contact our Data Protection Officer at [DPO@efltrust.com](mailto:DPO@efltrust.com).

#### 10. Who can I speak to about my personal information held by EFL Trust?

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You can e-mail your questions to [DPO@efltrust.com](mailto:DPO@efltrust.com).

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

**Telephone:** 0303 123 1113